# STATE OF ALABAMA ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:	
HOTEL CONNECT, MGT, LLC. ) MICHAEL ALLEN VON KANEL )	ADMINISTRATIVE ORDER NO. CD- 2002-0024
RESPONDENTS )	

#### CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the power to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act, upon due consideration of the subject matter hereof, and having confirmed information of the offers for sale and/or sell of securities, to wit: limited liability partnership interests into, within or from the state of Alabama, has determined as follows:

# <u>RESPONDENTS</u>

- 1. HOTEL CONNECT MANAGEMENT, LLC ("RESPONDENT HOTEL CONNECT MANAGENT, LLC"), is a Nevada cooperation, with a business address of 8215 S. Eastern Avenue, Suite 239, Las Vegas, NV 89123-2526. RESPONDENT HOTEL CONNECT MANAGEMENT, LLC is not registered as a securities dealer to sell securities in the State of Alabama.
- 2. MICHAEL ALLEN VON KANEL ("RESPONDENT VON KANEL") of 318 Oak Trace Drive, Birmingham, AL 35244 is a Alabama registered agent of John Hancock Mutual Life Insurance, with a business address of 200 Clarendon Street, Boston, MA 02117-0111 and Signator Investors, Inc. with a business address of 197 Clarendon Street, Boston, MA 02117. At all times relevant to violations set forth herein, RESPONDENT VON KANEL acted as an agent of RESPONDEDNT HOTEL CONNECT MANAGEMENT, LLC.

## STATEMENT OF FACTS

- 3. The Commission is in receipt of information that RESPONDENT VON KANEL is a registered securities agent in the State of Alabama with Signator Investors, Inc and engaged in the offer and/or sells of unregistered securities; to wit: investment contracts entitled Class (A) Membership Interests (Units), of HOTEL CONNECT MANAGEMENT, LLC, to Alabama residents.
- 4. A review of the registration files of the Alabama Securities Commission disclosed no record of registration or exemption from registration of the securities of RESPONDENT HOTEL CONNECT MANAGEMENT, LLC.

# CONCLUSIONS OF LAW

- 5. RESPONDENT HOTEL CONNECT MANAGEMENT, LLC is neither registered nor exempt from registration as a securities dealer in the state of Alabama, and has effected securities transactions with residents of the State of Alabama.
- 6. Transacting business in the state of Alabama as a dealer, without benefit of registration or exemption from registration, is a violation of Section 8-6-3(a), Code of Alabama 1975.
- 7. RESPONDENT VON KANEL has violated the provisions of Sections; 8-6-4, and 8-6-17, <u>Code of Alabama 1975</u> by engaging in dishonest or unethical practices, to wit: selling unregistered securities to Alabama residents.

8. Pursuant to the provisions of Section 8-6-3(j), <u>Code of Alabama 1975</u>, the Commission may suspend, revoke, censor or bar any registrant from employment with a securities dealer if the Commission finds that the Order is in the public interest, and that the registrant has violated or failed to comply with any provision of the Alabama Securities Act.

9. The dishonest and unethical sales practices alleged by Alabama residents, in the sale of securities by the RESPONDENTS, raise an inference of willful violation and failure to comply with the Alabama Securities Act or rules promulgated there under.

This Order is appropriate in the public interest for the protection of investors and consistent with the purposes of the Alabama Securities Act.

This Order does not prevent the Alabama Securities Commission from seeking such other civil or criminal remedies that are available to it under the Alabama Securities Act.

ACCORDINGLY, IT IS HEREBY ORDERED that, RESPONDENT HOTEL CONNECT MANAGEMENT, LLC and RESPONDENT MICHAEL ALLEN VON KANEL immediately CEASE AND DESIST from further offers or sales of any security into, within, or from the State of Alabama.

Entered at Montgomery, Alabama, this <u>30</u> day of <u>5.14.</u>, 2002.



ALABAMA SECURITIES COMMISSION 770 Washington Street, Suite 570 Montgomery, Alabama 36130-4700 BY:

JOSEPH P. BORG

Director